

**BURNS BAIR LLP**

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

10 E. Doty St., Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2808

Email: [tburns@burnsbair.com](mailto:tburns@burnsbair.com)

Email: [jbair@burnsbair.com](mailto:jbair@burnsbair.com)

*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11

Case No. 20-12345 (SCC)

**THIRTY-SECOND MONTHLY FEE STATEMENT OF BURNS BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
JUNE 1, 2023 THROUGH JUNE 30, 2023**

Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors</u>
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	<u>June 1, 2023 – June 30, 2023</u>
Amount of Compensation sought as actual, reasonable, and necessary:	\$90,200.90 <u>80% of which is \$72,160.72</u>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$0</u>
TOTAL (80% of fees and 100% of costs)	<u>\$72,160.72</u>

**This is the thirty-second monthly fee statement.**

### **PRELIMINARY STATEMENT**

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this thirty-second monthly statement (the “Monthly Statement”) for the period from June 1, 2023 through June 30, 2023 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests interim allowance and payment of compensation in the amount of \$72,160.72 (80% of \$90,200.90) for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair.

### **FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

<b>Name</b>	<b>Title</b>	<b>Year of Partnership</b>	<b>Year of Admission</b>	<b>Hourly Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Timothy Burns	Partner	2008	1991	\$975	34.30	\$33,442.50
Jesse Bair	Partner	2020	2013	\$625	36.80	\$23,000.00
Nathan Kuenzi	Associate	N/A	2020	\$420	13.60	\$5,712.00
Brian Cawley	Associate	N/A	2020	\$420	52.80	\$22,176.00
Leakhena Au	Associate	N/A	2020	\$420	3.70	\$1,554.00
Katie Sticklen	Summer Associate	N/A	N/A	\$378.00	7.80	\$2,948.40
Alyssa Turgeon	Paralegal	N/A	N/A	\$360.00	.20	\$72.00
Karen Dempksi	Paralegal	N/A	N/A	\$360.00	.80	\$288.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	2.80	\$1,008.00
<b>TOTAL:</b>					<b>152.80</b>	<b>\$90,200.90</b>

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients.

A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as Exhibit A.

**NOTICE AND OBJECTION PROCEDURES**

3. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

4. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by August 15, 2023 (the “Objection Deadline”) setting forth the nature of the objection and the amount of fees or expenses at issue.

5. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 80% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: July 31, 2023

BURNS BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

10 E. Doty St., Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2808

Email: [tburns@burnsbair.com](mailto:tburns@burnsbair.com)

Email: [jbair@burnsbair.com](mailto:jbair@burnsbair.com)

*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

**EXHIBIT A**

**EXHIBIT A**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Official Committee of Unsecured Creditors of The  
Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 7/24/2023

**Bill # :** 01165

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/1/2023	Jesse Bair	Preliminary review of the Court's Opinion denying the Diocese's motion for a preliminary injunction (.3); correspondence with state court counsel re insurance issues related to same (.1); review correspondence with B. Michael re same (.1);	0.50	\$312.50
6/1/2023	Jesse Bair	Review LMI's, Lexington's, and the Diocese's additional suggested edits to the joint status update letter to Judge Cave (.2);	0.20	\$125.00
6/1/2023	Jesse Bair	Review Judge Cave's order granting in part and denying in part the parties' discovery motions in the Arrowood district court action (.1);	0.10	\$62.50
6/1/2023	Jesse Bair	Prepare for discovery hearing in the Arrowood district court action (.2);	0.20	\$125.00
6/1/2023	Nathan Kuenzi	Analyze the Court's Opinion denying the Diocese's motion for a preliminary injunction (.5);	0.50	\$210.00
6/1/2023	Jesse Bair	Review B. Cosgrove's objection to Arrowood's subpoena (.1);	0.10	\$62.50
6/1/2023	Jesse Bair	Participate in discovery hearing in the Arrowood district court action (1.1);	1.10	\$687.50
6/2/2023	Jesse Bair	Review draft order denying the Diocese's preliminary injunction motion (.1);	0.10	\$62.50
6/2/2023	Jesse Bair	Review the Court's Order regarding proposed phase 1 discovery in the LMI district court action (.1);	0.10	\$62.50
6/3/2023	Jesse Bair	Continue analyzing the Court's Opinion denying the Diocese's motion for a preliminary injunction (1.2);	1.20	\$750.00
6/4/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re call to discuss the Court's preliminary injunction denial order (.1);	0.10	\$62.50

6/5/2023	Timothy Burns	Participate in state court counsel meeting re preliminary injunction ruling and going-forward case strategy for insurance purposes (1.1); participate in follow-up conference with J. Bair re same and insurance next-steps (.2);	1.30	\$1,267.50
6/5/2023	Jesse Bair	Participate in state court counsel meeting re preliminary injunction ruling and going-forward case strategy for insurance purposes (1.1); participate in follow-up conference with T. Burns re same and insurance next-steps (.2);	1.30	\$812.50
6/6/2023	Alyssa Turgeon	Participate in BB team meeting re case developments and assignments (.1);	0.10	\$36.00
6/6/2023	Jesse Bair	Review correspondence with the Diocese and Evanston re revised joint letter and proposed discovery schedule (.1);	0.10	\$62.50
6/6/2023	Jesse Bair	Additional analysis re potential Arrowood Section 349 strategy (.1);	0.10	\$62.50
6/6/2023	Katie Sticklen	Participate in BB team meeting re case status and related assignments (.1);	0.10	\$37.80
6/6/2023	Timothy Burns	Participate in BB team meeting re case status and related projects (.1);	0.10	\$97.50
6/6/2023	Jesse Bair	Participate in BB team meeting re case developments and assignments (.1);	0.10	\$62.50
6/6/2023	Leakhena Au	Participate in BB team meeting re case status and related assignments (.1);	0.10	\$42.00
6/6/2023	Nathan Kuenzi	Participate in BB team meeting re case status and related projects (.1);	0.10	\$42.00
6/6/2023	Timothy Burns	Review correspondence from J. Stang re competing Plan issue (.1);	0.10	\$97.50
6/6/2023	Jesse Bair	Analyze the Court's Order sustaining the Diocese's sixth omnibus claims objection (.8);	0.80	\$500.00
6/6/2023	Jesse Bair	Review K. Dine correspondence re case status and recent developments (.1);	0.10	\$62.50
6/7/2023	Jesse Bair	Review and edit revised version of memorandum to state court counsel re motion to dismiss issues (.3);	0.30	\$187.50
6/7/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood issues and strategy (.3);	0.30	\$187.50
6/7/2023	Jesse Bair	Correspondence with Arrowood and the Diocese re discovery meet and confer (.1);	0.10	\$62.50
6/7/2023	Jesse Bair	Correspondence with J. Stang re issues involving potential Section 349 claim against Arrowood (.1);	0.10	\$62.50
6/7/2023	Brian Cawley	Review materials sent by J. Bair regarding automatic stay and relief therefrom (.5); research case law re relief from stay issues in connection with potential parish insurance demand letters (2.3);	2.80	\$1,176.00

6/7/2023	Timothy Burns	Participate in conference with J. Bair re Evanston district court action and Committee Plan issues (.2); review J. Bair correspondence to Arrowood re discovery meet and confer (.1); review J. Bair correspondence re motion to dismiss memorandum to state court counsel (.1); review K. Dine correspondence re CemCo action (.1); review correspondence with Evanston and the Diocese re requested dismissal without prejudice (.1); review correspondence with J. Stang re Arrowood issues (.1); review K. Dine correspondence re case status and developments (.1); analysis re additional insurance projects for case next-steps (.1); review the Diocese's suggested changes to the draft order denying the Diocese's preliminary injunction motion (.1); review K. Brown correspondence re same (.1); participate in conference with J. Bair re Arrowood issues and strategy (.3); conference with J. Bair and B. Cawley re potential parish insurance demands and motion to lift stay motion (.3); participate in call with state court counsel and J. Bair re overall case insurance strategy and next-steps (.2); participate in follow-up call with J. Stang and J. Bair re same (.4);	2.30	\$2,242.50
6/7/2023	Jesse Bair	Review the Diocese's suggested edits to the draft preliminary injunction denial order (.1);	0.10	\$62.50
6/7/2023	Jesse Bair	Review revised draft joint letter to Judge Cave re potential Phase 1 issues and discovery in the LMI district court action (.2);	0.20	\$125.00
6/7/2023	Jesse Bair	Participate in conference with T. Burns re Evanston district court action and and Committee Plan issues (.2);	0.20	\$125.00
6/7/2023	Brian Cawley	Participate in conference with T. Burns and J. Bair re potential parish insurance demands and motion to lift stay motion (.3);	0.30	\$126.00
6/7/2023	Jesse Bair	Correspondence with the Diocese re Evanston district court action status and next-steps (.1);	0.10	\$62.50
6/7/2023	Jesse Bair	Review and edit revised draft of the Committee's second amended Plan (.7);	0.70	\$437.50
6/7/2023	Jesse Bair	Participate in call with state court counsel and T. Burns re overall case insurance strategy and next-steps (.2); participate in follow-up call with J. Stang and T. Burns re same (.4);	0.60	\$375.00
6/7/2023	Jesse Bair	Participate in conference with T. Burns and B. Cawley re potential parish insurance demands and motion to lift stay motion (.3);	0.30	\$187.50



6/8/2023	Jesse Bair	Review agenda for weekly strategy call with PSZJ team (.1); participate in portion of weekly strategy conference with PSZJ team and T. Burns for insurance purposes re litigation and insurance strategy (1.5);	1.60	\$1,000.00
6/8/2023	Jesse Bair	Participate in detailed conference with T. Burns re next-steps re case insurance and settlement strategy (.7);	0.70	\$437.50
6/8/2023	Jesse Bair	Review additional edits from LMI, Lexington, and the Diocese to the draft joint letter to Judge Cave re proposed Phase 1 issues and discovery (.2); review final version of letter submitted to the Court (.1);	0.30	\$187.50
6/8/2023	Timothy Burns	Participate in portion of weekly strategy conference with PSZJ team and J. Bair for insurance purposes re litigation and insurance strategy (1.5); analyze the Court's Opinion denying the Diocese's preliminary injunction motion (1.4); review amended version of the Committee's Plan (1.3); participate in conference with J. Bair re next-steps re case insurance and settlement strategy (.7); participate in call with state court counsel and J. Bair re insurance case strategy (.2); participate in additional detailed conference with J. Bair re insurance litigation and settlement strategy (1.1);	6.20	\$6,045.00
6/8/2023	Jesse Bair	Begin reviewing and editing revised version of the Committee's amended disclosure statement (1.2);	1.20	\$750.00
6/8/2023	Jesse Bair	Participate in additional detailed conference with T. Burns re insurance litigation and settlement strategy (1.1);	1.10	\$687.50
6/8/2023	Jesse Bair	Review additional suggested edits from Evanston and the Diocese to the draft joint letter to the Court in the Evanston district court action re proposed discovery schedule (.1); review final version of same (.1);	0.20	\$125.00
6/8/2023	Jesse Bair	Correspondence with the Diocese re Arrowood denials of coverage (.1);	0.10	\$62.50
6/8/2023	Jesse Bair	Participate in call with T. Burns and state court counsel re insurance case strategy (.2);	0.20	\$125.00
6/8/2023	Brian Cawley	Continue researching case law re relief from stay issues in connection with potential parish insurance demand letters (3.1); begin summarizing research for inclusion in motion for relief from automatic stay (1.8); outline motion for relief from automatic stay (1.5);	6.40	\$2,688.00
6/8/2023	Jesse Bair	Correspondence with Arrowood and the Diocese re discovery meet and confer (.1);	0.10	\$62.50

6/9/2023	Jesse Bair	Review revised version of the draft Order denying the Diocese's motion for a preliminary injunction (.1);	0.10	\$62.50
6/9/2023	Jesse Bair	Participate in state court counsel meeting re case insurance and litigation strategy (1.3); participate in portion of post-meeting conference with PSZJ and T. Burns re outcome of state court counsel meeting and next-steps re same (.4);	1.70	\$1,062.50
6/9/2023	Jesse Bair	Draft PowerPoint presentation re proposed insurance strategy for use during upcoming state court counsel meeting (.6); participate in conference with T. Burns re same and preparations for meeting (.7);	1.30	\$812.50
6/9/2023	Brian Cawley	Continue researching case law re relief from stay issues in connection with potential parish insurance demand letters (2.7);	2.70	\$1,134.00
6/9/2023	Timothy Burns	Prepare for state court counsel meeting re insurance strategy and next-steps (1.0); revise and edit insurance PowerPoint presentation for use during same (.6); participate in conference with J. Bair re PowerPoint presentation and preparations for state court counsel insurance meeting (.7); participate in state court counsel meeting re case insurance strategy (1.3); participate in portion of post-meeting conference with PSZJ and J. Bair re outcome of state court counsel meeting and next-steps re same (.4); conference with J. Bair re insurance meeting with the Diocese (.1); review correspondence from B. Michael re agenda for upcoming PSZJ team strategy meeting (.1); review correspondence from the Diocese re Arrowood denials of coverage (.1);	4.30	\$4,192.50
6/9/2023	Jesse Bair	Correspondence with the Diocese re call to discuss case insurance issues (.1); participate in conference with T. Burns re same (.1);	0.20	\$125.00
6/9/2023	Jesse Bair	Review summary re Arrowood coverage denials of parishes and affiliated entities (.1);	0.10	\$62.50
6/10/2023	Jesse Bair	Review B. Michael correspondence re agenda for upcoming team meeting re case litigation strategy (.1);	0.10	\$62.50
6/10/2023	Timothy Burns	Review C. Moore deposition notice re the Committee's motion to dismiss (.1); review correspondence from Reed Smith re insurance meeting with the Diocese (.1); review correspondence with the Diocese and PSZJ re draft preliminary injunction order (.1);	0.30	\$292.50
6/11/2023	Brian Cawley	Begin drafting motion for relief from stay in connection with potential parish insurance demand letters (2.1);	2.10	\$882.00

6/12/2023	Jesse Bair	Participate in BB team meeting re case developments and ongoing projects (.1);	0.10	\$62.50
6/12/2023	Brian Cawley	Participate in BB team meeting regarding case status and related assignments (.1);	0.10	\$42.00
6/12/2023	Timothy Burns	Participate in call with J. Stang re issues re Delaware regulatory supervision of Arrowood (.2); participate in call with J. Bair re same (.2);	0.40	\$390.00
6/12/2023	Jesse Bair	Review T. Burns correspondence re Arrowood strategy (.1);	0.10	\$62.50
6/12/2023	Jesse Bair	Participate in conference with Reed Smith and T. Burns re Arrowood issues (.6); post-call discussion with T. Burns re outcome of same and next-steps (.2);	0.80	\$500.00
6/12/2023	Brian Cawley	Continue researching case law re relief from stay issues in connection with potential parish insurance demand letters (3.4); continue drafting motion for relief from automatic stay in connection with same (4.0);	7.40	\$3,108.00
6/12/2023	Nathan Kuenzi	Participate in BB team meeting re case developments and assignments (.1);	0.10	\$42.00
6/12/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood strategy and preparations for upcoming call with Reed Smith re Arrowood issues (.4);	0.40	\$250.00
6/12/2023	Jesse Bair	Review Judge Cave's Orders re upcoming discovery status conferences in the LMI and Evanston district court actions (.1);	0.10	\$62.50
6/12/2023	Timothy Burns	Review and respond to correspondence re Arrowood strategy (.2); participate in BB team meeting re case developments and ongoing projects (.1); conference with J. Bair re Arrowood strategy and upcoming call with Reed Smith re Arrowood issues (.4); review and respond to correspondence from state court counsel re Arrowood issues (.2); conference with J. Bair re writ action against Arrowood in Delaware (.1); participate in call with state court counsel re developments re Arrowood (.1); participate in conference with Reed Smith and J. Bair re Arrowood issues (.6); participate in post-call discussion with T. Burns re outcome of same and next-steps (.2); review J. Bair insurance statue update correspondence to PSZJ team (.1); review various correspondence with Reed Smith, LMI, and Lexington re hearing on discovery in insurance district court proceeding (.2); review proposed Order adjourning discovery hearing in LMI/Lexington insurance district court proceeding (.1);	2.30	\$2,242.50
6/12/2023	Katie Sticklen	Participate in BB team meeting regarding case status and related assignments (.1);	0.10	\$37.80

6/12/2023	Alyssa Turgeon	Participate in BB team meeting re case developments and ongoing projects (.1);	0.10	\$36.00
6/12/2023	Jesse Bair	Review proposed Order adjourning the LMI discovery status conference and related correspondence with LMI and the Diocese re same (.1);	0.10	\$62.50
6/12/2023	Jesse Bair	Review K. Dine correspondence re case developments and next-steps (.1);	0.10	\$62.50
6/12/2023	Jesse Bair	Participate in conference with T. Burns re status of Diocese of Brooklyn's writ action against Arrowood in Delaware (.1); conference with B. Cawley re additional materials needed in connection with same (.1);	0.20	\$125.00
6/12/2023	Jesse Bair	Participate in call with T. Burns re issues re Delaware regulatory supervision of Arrowood (.2);	0.20	\$125.00
6/12/2023	Jesse Bair	Draft insurance status update email to PSZJ team re recent call with Reed Smith re Arrowood and other insurance issues (.3);	0.30	\$187.50
6/13/2023	Jesse Bair	Prepare for discovery meet and confer with Arrowood and the Diocese (.4); participate in discovery meet and confer with Arrowood and the Diocese (.5);	0.90	\$562.50
6/13/2023	Jesse Bair	Review monthly Diocese PSIP report (.1);	0.10	\$62.50
6/13/2023	Jesse Bair	Participate in portion of PSZJ team strategy meeting for insurance purposes re mediation, litigation, and settlement strategy (1.2) ; participate in post-meeting call with T. Burns re insurance next-steps (.1);	1.30	\$812.50
6/13/2023	Brian Cawley	Finalize motion to lift the stay in connection with potential parish insurance demand letters (1.3); review preliminary feedback on draft from T. Burns (.2); conference with J. Bair re suggested revisions to draft motion (.2); implement partner feedback in draft (2.8);	4.50	\$1,890.00
6/13/2023	Jesse Bair	Analyze and respond to Claro questions re operation of certain Arrowood policies (.2);	0.20	\$125.00
6/13/2023	Jesse Bair	Review revised version of adjournment letter of LMI/Lexington discovery conference and related correspondence (.1);	0.10	\$62.50
6/13/2023	Jesse Bair	Participate in call with T. Burns re discovery meet and confer outcome, Arrowood strategy, and overall insurance strategy (.4);	0.40	\$250.00
6/13/2023	Jesse Bair	Preliminary review re draft motion to lift stay in connection with potential insurance demand letters (.3); conference with B. Cawley re suggested edits to same (.2);	0.50	\$312.50
6/13/2023	Jesse Bair	Revise and edit draft Section 349 complaint against Arrowood (.1); correspondence with Reed Smith re same (.2);	0.30	\$187.50

6/13/2023	Jesse Bair	Participate in call with T. Burns re Arrowood strategy (.1);	0.10	\$62.50
6/13/2023	Timothy Burns	Review docket order from Mag. Judge Cave re July 15 hearing on discovery issues (.1); review case dockets of Delaware and NC actions involving Arrowood (.2); review Diocese PSIP monthly report (.1); review and revise draft motion to lift stay in connection with potential insurance demand letters (.8); review J. Bair correspondence to Reed Smith re draft Section 349 complaint against Arrowood (.1); participate in call with J. Bair re Arrowood strategy (.1); review materials re Arrowood's Delaware regulatory supervision from writ of mandamus proceeding in Delaware and unfair business practices action in North Carolina (1.2); participate in call with B. Cawley re Arrowood research project (.2); participate in call with J. Bair re meet and confer outcome, Arrowood strategy, and overall insurance strategy (.4); participate in portion of PSZJ team strategy meeting for insurance purposes re mediation, litigation, and settlement strategy (1.2); participate in post-meeting call with J. Bair re insurance next-steps (.1);	4.50	\$4,387.50
6/13/2023	Brian Cawley	Research constitutional right to petition in context of automatic stay (.8); draft email summarizing right to petition research for T. Burns (.5);	1.30	\$546.00
6/13/2023	Jesse Bair	Continue reviewing and editing the Committee's second amended disclosure statement (.7);	0.70	\$437.50
6/13/2023	Jesse Bair	Review motion to dismiss scheduling order (.1);	0.10	\$62.50
6/13/2023	Brian Cawley	Analysis of relevant pleadings and motions filed in the unfair business practices action against Arrowood in North Carolina and the writ of mandamus action involving Arrowood in Delaware (1.1);	1.10	\$462.00
6/14/2023	Brian Cawley	Discuss new research assignment on Delaware duty to settle with J. Bair (.2); research contours of Delaware duty to settle law (2.9);	3.10	\$1,302.00
6/14/2023	Jesse Bair	Analysis re insurer demand letter issues (.1); correspondence with B. Michael re same (.1);	0.20	\$125.00
6/14/2023	Jesse Bair	Analysis re Delaware duty to settle law in connection with Arrowood strategy (.1); participate in conference with B. Cawley re same and additional research needed (.2);	0.30	\$187.50
6/14/2023	Jesse Bair	Analysis re Arrowood claims monitor information (.1); participate in conference with T. Burns re same (.1);	0.20	\$125.00
6/14/2023	Brian Cawley	Additional analysis of relevant pleadings and motions from Delaware writ of mandamus action involving Arrowood (1.0);	1.00	\$420.00

6/14/2023	Timothy Burns	Review Committee motion to amend claims objections procedures and related papers (.2); review letter from C. Ball re same (.1); detailed review of Arrowood materials from Delaware writ proceeding and North Carolina unfair business practices proceeding (2.6);	2.90	\$2,827.50
6/15/2023	Timothy Burns	Participate in calls with state court counsel re Arrowood strategy (.6); participate in call with J. Bair re same (.1);	0.70	\$682.50
6/15/2023	Jesse Bair	Prepare for discovery hearing in the LMI district court action (.1); participate in discovery hearing in the LMI district court action (.6);	0.70	\$437.50
6/15/2023	Nathan Kuenzi	Begin supplemental analysis re New York and Delaware Guarantee Funds in connection with Arrowood strategy (1.0);	1.00	\$420.00
6/15/2023	Nathan Kuenzi	Research and analyze particular issues under New York and Delaware law involving New York and Delaware guaranty funds and approach of sexual abuse claimants to obtaining recovery under those funds (4.8);	4.80	\$2,016.00
6/15/2023	Jesse Bair	Participate in call with T. Burns re Arrowood strategy (.1);	0.10	\$62.50
6/15/2023	Brian Cawley	Continue researching Delaware law re insurer duty to settle issues (3.5); begin drafting summary of Delaware duty to settle issues (.7);	4.20	\$1,764.00
6/16/2023	Nathan Kuenzi	Draft summary for T. Burns re guarantee fund research results (1.4);	1.40	\$588.00
6/16/2023	Jesse Bair	Prepare for state court counsel meeting (.2); participate in state court counsel meeting for insurance purposes re case litigation and settlement strategy (.6);	0.80	\$500.00
6/16/2023	Nathan Kuenzi	Continue researching and analyzing particular issues under New York and Delaware law involving New York and Delaware guaranty funds and approach of sexual abuse claimants to obtaining recovery under those funds (2.6);	2.60	\$1,092.00
6/16/2023	Jesse Bair	Review Reed Smith correspondence re potential section 349 complaint against Arrowood (.1); conference with T. Burns re same (.1);	0.20	\$125.00
6/16/2023	Brian Cawley	Continue researching duty to settle issues under Delaware law (1.0); continue drafting summary of research results and send to T. Burns and J. Bair (.7);	1.70	\$714.00
6/16/2023	Timothy Burns	Analyze the Diocese's response to request to bring Section 349 GBL action against Arrowood (.2); conference with J. Bair re same (.1); prepare for state court counsel meeting (.2); participate in state court counsel meeting for insurance purposes re case litigation and settlement strategy (.6);	1.10	\$1,072.50

6/16/2023	Jesse Bair	Prepare for discovery hearing in the Evanston district court action (.1); participate in discovery hearing in the Evanston district court action (.4);	0.50	\$312.50
6/19/2023	Jesse Bair	Review Arrowood's letter to Judge Cave re Cosgrove subpoena resolution (.1);	0.10	\$62.50
6/19/2023	Jesse Bair	Analysis re Arrowood claim count (.2); correspondence with T. Burns re same (.1);	0.30	\$187.50
6/19/2023	Timothy Burns	Review B. Michael correspondence re Committee meeting and agenda (.1); review Phase 1 discovery order in LMI district court action (.1); review Arrowood letter to Court re Cosgrove deposition and endorsement of Court (.1); reviewed Pfau firm's response to 11th Claims Objection and Amala declaration (.2); reviewed Slater firm's response to 11th Claims Objection (.1); reviewed Merson declaration re 12th Claims Objection (.1); reviewed Gair firm's joinder to motion to dismiss (.1); review Ketterer firm's opposition to 12th Claims Objection (.2); reviewed Debtor's deposition notices of Amala and D'Estries (.1); reviewed correspondence from B. Michael re unstayed cases (.1); review J. Cave's order re stay in Evanston district court action (.1); review LMI's response to the Committee's Insurance Law Section 3420 letter (.1); review J. Cave's minute entry re Evanston hearing (.1); review J. Bair memo re unstayed cases (.1); review information provided by Reed Smith re changes to Section 349 of the GBL (.2); review B. Cawley's Arrowood related research memo (.2); review N. Kuenzi's Arrowood related research memos (.2); review the Committee's deposition notice of Diocese (.1); review Ninth Omnibus Objection Order (.1); review Sixth Omnibus Claims Objection Order (.1); review revised version of draft motion to lift say in connection with potential parish insurance demands (.3); review 13th Omnibus Objection (.3); review 14th Omnibus Objection (.2); review 15th Omnibus Claims Objection (.2); review First Amended Stipulation and Agreed Scheduling Order (.1); review the Committee's meet-and-confer letter re claims objections procedures (.1); prepared note to file re 6/16/23 State Court Counsel call (.3); review late notice and expected/intended research (.5); review notice of propensity to abuse research (.5);	5.00	\$4,875.00
6/19/2023	Jesse Bair	Review discovery order entered in the Evanston District Court action (.1);	0.10	\$62.50
6/19/2023	Jesse Bair	Review LMI's response to the Committee Section 3420 notice letter (.1);	0.10	\$62.50
6/19/2023	Jesse Bair	Review discovery order entered in the LMI District Court action (.1);	0.10	\$62.50

6/19/2023	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
6/20/2023	Timothy Burns	Conference with J. Bair re insurance mediation strategy and Arrowood issues (.2); participate in Committee meeting for insurance purposes re case developments and strategy (.7);	0.90	\$877.50
6/20/2023	Jesse Bair	Review the Diocese's objection to the Committee's motion to amend the claim objections procedures order (.2);	0.20	\$125.00
6/20/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case developments and strategy (.7);	0.70	\$437.50
6/20/2023	Jesse Bair	Participate in conference with T. Burns re mediation strategy and Arrowood issues (.2);	0.20	\$125.00
6/21/2023	Leakhena Au	Review grand jury report and summarize expected or intended issues re the parishes (2.1);	2.10	\$882.00
6/21/2023	Jesse Bair	Review the Diocese's letter to the Court re scope of notice discovery (.1); review the Committee's response to same (.1);	0.20	\$125.00
6/21/2023	Jesse Bair	Analysis re insurance demand letter issues (.1); participate in call with B. Michael re same (.4);	0.50	\$312.50
6/21/2023	Jesse Bair	Review prior analysis re expected or intended issues (.1); provide instructions to L. Au re supplemental analysis needed in connection with same (.1);	0.20	\$125.00
6/22/2023	Leakhena Au	Continue reviewing grand jury report, summarize expected or intended issues related to the parishes, and send findings to J. Bair (1.5);	1.50	\$630.00
6/22/2023	Jesse Bair	Review N. Kuenzi email memorandum re Delaware unfair claims handling rules in connection with Arrowood strategy (.2);	0.20	\$125.00
6/22/2023	Timothy Burns	Review L. Au's notice/knowledge memo (.2); review agenda for weekly strategy call with PSZJ (.1); review the Diocese's objection to motion to amend claims objections procedures (.2); review letter to the Court from the Diocese re scope of notice discovery (.2); review the Committee's response letter (.1);	0.80	\$780.00
6/22/2023	Jesse Bair	Review correspondence with B. Michael and state court counsel re motion to dismiss hearing issues (.1);	0.10	\$62.50
6/22/2023	Jesse Bair	Review L. Au email memorandum re parameters of Committee intervention rights in connection with Arrowood district court action (.1);	0.10	\$62.50
6/22/2023	Jesse Bair	Review agenda for weekly strategy call with PSZJ (.1);	0.10	\$62.50
6/23/2023	Jesse Bair	Correspondence with B. Michael re insurance demand letter issues (.2);	0.20	\$125.00



6/23/2023	Jesse Bair	Review and consider L. Au's supplemental expected or intended analysis (.4);	0.40	\$250.00
6/23/2023	Jesse Bair	Preliminary analysis re Interstate's responses to the Committee's Section 3420 notice letter (.2);	0.20	\$125.00
6/23/2023	Jesse Bair	Review the Diocese's reply in support of its 11th omnibus claims objection re BSA claims (.1);	0.10	\$62.50
6/23/2023	Timothy Burns	Review correspondence with PSZJ and state court counsel re motion to dismiss hearing (.1);	0.10	\$97.50
6/23/2023	Jesse Bair	Additional analysis re LMI's response to the Committee's Section 3420 notice letter (.1); correspond with LMI re same (.1);	0.20	\$125.00
6/23/2023	Jesse Bair	Review the Committee's reply in support of its motion to amend claims objections procedures order (.1);	0.10	\$62.50
6/23/2023	Karen Dempksi	Draft monthly BB fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
6/26/2023	Brian Cawley	Correspond with J. Bair regarding Interstate coverage letter review project (.2); begin analyzing each individual coverage position letter sent by Interstate to state court counsel (1.4);	1.60	\$672.00
6/26/2023	Jesse Bair	Additional analysis of Interstate's responses to the Committee's Section 3420 notice letter (.2); provide instructions to N. Kuenzi and B. Cawley re supplemental analysis needed in connection with same (.2);	0.40	\$250.00
6/26/2023	Jesse Bair	Participate in conference with T. Burns re case developments and insurance next-steps (.1);	0.10	\$62.50
6/26/2023	Nathan Kuenzi	Review correspondence with J. Bair regarding Interstate coverage letter review project (.2); begin analyzing each individual coverage position letter sent by Interstate to state court counsel (1.6);	1.80	\$756.00
6/26/2023	Jesse Bair	Review correspondence with J. Stang and state court counsel re parish stay issues (.1);	0.10	\$62.50
6/26/2023	Jesse Bair	Review Lexington's response to the Committee's Section 3420 notice letter (.2);	0.20	\$125.00
6/26/2023	Timothy Burns	Participate in conference with J. Bair re case developments and insurance next-steps (.1);	0.10	\$97.50
6/27/2023	Nathan Kuenzi	Analyze issues raised by partial denial and reservation of rights in review of Interstate coverage position letters (1.3);	1.30	\$546.00
6/27/2023	Timothy Burns	Review correspondence re removal issues (.2); review correspondence re claims objection hearing (.2); review correspondence with Arrowood re protective order (.2);	0.60	\$585.00
6/27/2023	Jesse Bair	Answer B. Cawley questions re analysis of Interstate coverage position letters (.1);	0.10	\$62.50

6/27/2023	Jesse Bair	Review draft joint letter to Judge Cave re proposed confidentiality agreement in the Arrowood district court action (.1); review draft confidentiality stipulation (.1); correspondence with the Diocese and Arrowood re same (.1);	0.30	\$187.50
6/27/2023	Brian Cawley	Continue analyzing each individual coverage position letter sent by Interstate to state court counsel (5.6);	5.60	\$2,352.00
6/27/2023	Katie Sticklen	Discuss Interstate coverage letter review project with B. Cawley (.7); begin analyzing each individual coverage position letter sent by Interstate to state court counsel (2.2);	2.90	\$1,096.20
6/27/2023	Jesse Bair	Correspondence with B. Horn re BB's eighth interim fee application (.2);	0.20	\$125.00
6/27/2023	Jesse Bair	Review correspondence from B. Michael re motion to dismiss hearing issues (.1);	0.10	\$62.50
6/27/2023	Brian Cawley	Discuss Interstate coverage letter review project with K. Sticklen (.7);	0.70	\$294.00
6/28/2023	Katie Sticklen	Continue analyzing each individual coverage position letter sent by Interstate to state court counsel (4.7);	4.70	\$1,776.60
6/28/2023	Jesse Bair	Review final version of the Arrowood district court action confidentiality stipulation and protective order (.1);	0.10	\$62.50
6/28/2023	Brian Cawley	Continue analyzing each individual coverage position letter sent by Interstate to state court counsel (4.0);	4.00	\$1,680.00
6/29/2023	Brenda Horn-Edwards	Draft BB eighth interim fee application (1.6); revise declaration of T. Burns re same (.2); draft exhibits to same (.8); correspond with J. Bair re same (.1);	2.70	\$972.00
6/29/2023	Jesse Bair	Review the Diocese's opposition to the Committee's motion to dismiss (.5); conference with T. Burns re same (.1);	0.60	\$375.00
6/29/2023	Brian Cawley	Finalize summary of Interstate coverage position letters sent to state court counsel (2.2);	2.20	\$924.00
6/29/2023	Jesse Bair	Review Arrowood's response to the Committee's Section 3420 notice letter (.2);	0.20	\$125.00
6/29/2023	Jesse Bair	Review the parties' joint status letter to Judge Rochon in the Arrowood district court action (.1);	0.10	\$62.50
6/29/2023	Jesse Bair	Review the future claims representative's opposition to the Committee's motion to dismiss (.3);	0.30	\$187.50
6/29/2023	Jesse Bair	Review draft of the Committee's reply in support of its motion to dismiss (.3);	0.30	\$187.50
6/29/2023	Timothy Burns	Conference with J. Bair re the Diocese's opposition to the Committee's motion to dismiss (.1);	0.10	\$97.50

6/30/2023	Jesse Bair	Review correspondence with the mediator re Arrowood claims monitor issues (.1); review Delaware regulator order in connection with same (.1);	0.20	\$125.00
6/30/2023	Jesse Bair	Review suggested addendum to the case protective order provided by Arrowood (.1);	0.10	\$62.50
6/30/2023	Jesse Bair	Review K. Dine correspondence re motion to dismiss update (.1);	0.10	\$62.50
6/30/2023	Jesse Bair	Review P. Shields declaration in support of the Committee's motion to dismiss (.1);	0.10	\$62.50
6/30/2023	Brenda Horn-Edwards	Revise BB eighth interim fee application (.1);	0.10	\$36.00
6/30/2023	Jesse Bair	Review J. Amala declaration in support of the Committee's motion to dismiss (.1);	0.10	\$62.50
6/30/2023	Jesse Bair	Review Judge Rochon's Order adjourning the post-discovery hearing in the Arrowood district court action (.1);	0.10	\$62.50
6/30/2023	Jesse Bair	Review P. Stoneking declaration in support of the Committee's motion to dismiss (.1);	0.10	\$62.50
6/30/2023	Timothy Burns	Correspondence with the mediator re Arrowood claims monitor issues (.1); review correspondence with J. Bair and Arrowood re protective order in district court proceeding (.1);	0.20	\$195.00
6/30/2023	Jesse Bair	Review C. d'Estries declaration in support of the Committee's motion to dismiss (.1);	0.10	\$62.50

**Total Hours and Fees****152.80 \$90,200.90****Timekeeper Summary**

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Alyssa Turgeon	0.20	\$360.00	\$72.00
Brenda Horn-Edwards	2.80	\$360.00	\$1,008.00
Brian Cawley	52.80	\$420.00	\$22,176.00
Jesse Bair	36.80	\$625.00	\$23,000.00
Karen Dempksi	0.80	\$360.00	\$288.00
Katie Sticklen	7.80	\$378.00	\$2,948.40
Leakhena Au	3.70	\$420.00	\$1,554.00
Nathan Kuenzi	13.60	\$420.00	\$5,712.00
Timothy Burns	34.30	\$975.00	\$33,442.50

**Total Due This Invoice: \$90,200.90**